

EXHIBIT B

1 UNITED STATES BANKRUPTCY COURT
2 WESTERN DISTRICT OF WASHINGTON
3 AT SEATTLE

4 _____
5 In re:)
6)
6 NORTHWEST TERRITORIAL MINT,)
LLC,)
7)
Debtor.) No. 16-11767-CMA
8)
9 _____

10 DEPOSITION UPON ORAL EXAMINATION

11 OF

12 ANNETTE TRUNKETT
13 _____

14 1:25 P.M.

15 JULY 29, 2016

16 1000 SECOND AVENUE, SUITE 3500

17 SEATTLE, WASHINGTON
18
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22
23

24 REPORTED BY: CHERYL O. SPRY, CCR No. 2226
25

1 A P P E A R A N C E S

2

3

4 FOR THE CHAPTER 11 TRUSTEE:

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20

21

22 ALSO PRESENT:

23 ROSS HANSEN

24

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9 for Order Holding Ross Hansen in

10 Contempt for Violation of the Automatic

11 Stay

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18 deposition

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1 SEATTLE, WASHINGTON; JULY 29, 2016

2 1:25 P.M.

3 --oOo--

4 ANNETTE TRUNKETT,

5 sworn as a witness by the Certified Court Reporter,

6 testified as follows:

7 EXAMINATION

8 BY MR. FRUSH:

9 Q. Have you ever been deposed before?

10 A. Yes, I have.

11 Q. Okay. About how many times?

12 A. Once.

13 Q. Okay. Was that in this case? You were

14 deposed in this matter.

15 A. Since I've been in employment with Northwest

16 Territorial Mint, yes.

17 Q. Right. You were deposed in connection with

18 the money that Diane obtained; is that right?

19 A. Correct.

20 Q. All right. Well, my name is Jim Frush. I

21 represent Ross Hansen. I don't know what you learned in

22 the last deposition. I do want you to be comfortable.

23 If you're not comfortable, you want to take a break, you
24 want to talk to Mr. Gearin, feel free to indicate that
25 at any time.

5

1 I would ask you if I've asked you a question,
2 it's not quite right that you'd want to confer with him
3 before you give an answer. Just answer the question and
4 then say, "I'd like to talk to my attorney," or to
5 Mr. Gearin, and we'll take a break. Okay?

6 A. Okay.

7 Q. I don't think we're going to be here long.
8 We've only got you scheduled for an hour or two, and so
9 this is not going to be an endurance contest. But any
10 time you want a break, say so.

11 If you don't understand my questions or you're
12 confused, and I'm like a lot of attorneys, a lot of the
13 questions I ask aren't very artful, just say "I don't
14 understand" or "I'm confused," or whatever, and I'll
15 either rephrase the question or try to ask it in a more
16 direct fashion.

17 A. Okay.

18 Q. Yes. Why don't you state your name and spell
19 your last name for the record.

20 A. Annette Trunkett, T-R-U-N-K-E-T-T.

21 Q. Do you have a mailing address, ma'am?

22 A. 22913 112th Place Southeast, Kent, 98031.
23 Q. I'm going to talk about the Northwest
24 Territorial Mint. I'm just going to call it the "Mint,"
25 so you'll know what I mean when I talk about the Mint.

6

1 Is that fair?
2 A. Yes.
3 Q. Okay. We also have a company called Medallic
4 Art. And I'm just going to call that probably
5 "Medallic."
6 A. Okay.
7 Q. I understand you might have some back
8 problems. I do want to make sure, and this is a
9 deposition, it's under oath, we have a deposition
10 transcript, are you -- and I don't mean anything
11 negative about this, I'm just trying to find out, are
12 you under any influence of any kind of prescription
13 medication at all?
14 A. No.
15 Q. Okay, great. That's super.
16 All right. What's your current position at
17 the Mint?
18 A. Accounting supervisor.
19 Q. And how many people do you supervise?
20 A. Two other people, at this time.

21 Q. When the company was managed by Mr. Hansen,
22 how many people did you supervise?
23 A. Three people.
24 Q. Okay. And who did you report to when
25 Mr. Hansen was there?

7

1 A. In what time period? Since I've been the
2 supervisor?
3 Q. Yes.
4 A. I reported to Greg Fullington. Excuse me.
5 Once I became accounting supervisor, I reported to John
6 Young.
7 Q. To who?
8 A. Jay Young, Jay Young.
9 (Deposition Exhibit 1 was marked for
10 identification.)
11 Q. (BY MR. FRUSH:) And did you report to Sam
12 Furuness at one time?
13 A. Yes, I did.
14 Q. Okay. I'm going to show you what's been
15 marked as Exhibit 1. This is a declaration of yours, I
16 believe, Annette.
17 A. Yes.
18 Q. When was the last time you reviewed this
19 declaration?

20 A. Yesterday.

21 Q. Is it accurate in all respects?

22 A. Yes.

23 Q. Do you want to make any changes in it?

24 A. Not that I'm aware of.

25 Q. Okay. Now, you worked with Sam Furuness at

8

1 one time. And he was the CFO of the company; is that

2 right?

3 A. Yes.

4 Q. And there came a time, was there not, that

5 Mr. Hansen became very frustrated over some invoices in

6 that sales tax was being paid, I think about \$400,000,

7 in Texas that didn't need to be paid? Do you remember

8 that?

9 A. I do recall.

10 Q. And Mr. Furuness was actually discharged over

11 that incident, wasn't he?

12 A. I was not aware of why specifically he was let

13 go.

14 Q. He was let go --

15 A. A specific reason.

16 Q. He was let go right after that incident. Is

17 that your recollection?

18 A. Yes, yes, he was.

19 Q. And you and he had a meeting with Mr. Hansen
20 about that episode, I recollect.
21 A. Yes.
22 Q. And in fact, you were responsible for paying
23 the taxes; isn't that right?
24 A. Yes, I was.
25 Q. But you reported to Mr. Furuness. And is the

9

1 number I have of about \$400,000 that had been wrongfully
2 paid, is that about accurate, in your recollection?
3 A. No, it is not.
4 Q. How much money was involved?
5 A. It was \$40,000.
6 Q. \$40,000?
7 A. That was my calculation of the overpayment.
8 Q. Of the overpayment, all right.
9 And Mr. Hansen was very upset about that,
10 wasn't he?
11 A. Uh-huh.
12 Q. In your declaration in paragraph two you talk
13 about Mr. Hansen calling you and a former CFO in the
14 company in the office and yelling at you. Do you
15 remember that?
16 A. Yes, I do.
17 Q. And you indicate in your declaration that he

18 yelled at you for four hours.

19 A. Approximately.

20 Q. Now, if you go to a Seahawk game, that's
21 about, oh, two hours or so, maybe a little more. Is it
22 your recollection that Mr. Hansen yelled at you for the
23 equivalent time of a couple of Seahawks games, for four
24 hours?

25 A. We went in before 4:00 and left after 7:00.

10

1 Q. So it's closer to three hours?

2 A. Could have been closer to three or four. It
3 was approximately.

4 Q. And he yelled that entire time?

5 A. Maybe not consistently, no.

6 Q. So to say that he yelled at you for
7 approximately four hours is really not accurate, is it?

8 A. He was yelling at somebody in the room most of
9 the time.

10 Q. Is it fairer to say that, say, for some period
11 of time closer to three hours that he would
12 intermittently yell at you or Sam?

13 A. Repeat the question, please.

14 Q. Sure. It's one of those bad questions.

15 I'm trying to get a little more accurate
16 description. It sounds like to me that it was probably

17 closer to three hours than four hours. Isn't that fair

18 to say?

19 MR. GEARIN: I think she's already answer that

20 question, asked and answered.

21 Q. (BY MR. FRUSH:) And it wasn't a constant

22 yelling, was it?

23 MR. GEARIN: Again, asked and answered.

24 Q. (BY MR. FRUSH:) Go ahead and answer.

25 A. To my recollection, it was pretty constant,

11

1 yes, it was.

2 Q. Now, he was upset because that had cost the

3 company a lot of money; isn't that right?

4 A. \$40,000.

5 Q. And you had actually been responsible for

6 paying those taxes; isn't that right?

7 A. The CFO was responsible for the accounting

8 department.

9 Q. Right. And so Mr. Hansen didn't take that out

10 on you, did he?

11 A. What?

12 Q. That error.

13 A. I was brought into the office and yelled at

14 just as -- right beside the CFO.

15 Q. And you were not terminated or disciplined for

16 that mistake, were you?

17 A. I was not terminated.

18 Q. And Mr. Furuness was terminated at that point
19 in time; is that right?

20 A. He left the company shortly after that
21 incident, yes.

22 Q. And you in fact took over his job and became
23 the accounting manager, at that time; isn't that
24 correct?

25 A. I did not.

12

1 Q. When did that happen?

2 A. I have not ever taken over Sam Furuness's job.

3 Q. Oh, okay. Were you given a promotion after
4 that event?

5 A. No, I was not.

6 Q. Your job stayed the same?

7 A. Yes, it did.

8 Q. Who supervised you at that point?

9 A. Greg Fullington.

10 Q. I thought Greg Fullington was the counsel for
11 the company.

12 A. He is.

13 Q. So he was both CFO and counsel?

14 A. He was acting CFO for a time after Sam left.

15 Q. Did he transition into being counsel for the
16 company from the CFO position?

17 A. He was the counsel for the company and
18 additionally took on the responsibility.

19 Q. Of CFO?

20 A. Acting CFO.

21 Q. After Sam left?

22 A. Yes.

23 Q. Let's put a date to that, if you can. You may
24 not be able to.

25 A. September of 2014.

13

1 Q. Okay. And had he been at the company -- had
2 Mr. Fullington been at the top prior to that time?

3 A. Yes.

4 Q. And prior to that time, had he had any
5 responsibilities for -- did he have any responsibility
6 for the finances of the company?

7 A. Not to my knowledge.

8 Q. So that was a new obligation or responsibility
9 that was given to Mr. Fullington after Sam left?

10 A. It was not my knowledge whether he had any
11 previous intermixing with accounting or not. I was not
12 in a position of knowing if he was interacting in
13 accounting.

14 Q. Did you -- go ahead.

15 A. I was not a manager.

16 Q. Did you report to him after that point, to

17 Mr. Fullington?

18 A. Greg Fullington? Yes.

19 Q. Was part of his responsibility ensuring that

20 orders were fulfilled in an appropriate time?

21 A. I do not have knowledge of that. I cannot

22 answer that question.

23 Q. Okay. I'm going to show you what's been

24 marked --

25 MR. FRUSH: We're going to mark this new.

14

1 (Deposition Exhibit 2 was marked for

2 identification.)

3 Q. (BY MR. FRUSH:) This is Exhibit 2. Now,

4 you'll see that there is a mark on there that says

5 Exhibit 8, Calvert. That's just an indication that this

6 document, same document was put forward in a deposition

7 yesterday of Mr. Calvert. We're going to refer to it as

8 Exhibit 2 for your deposition.

9 Would you take a look at that, please?

10 A. Yes.

11 Q. Do you recognize this?

12 A. Yes, I do.

13 Q. What is this?

14 A. This is a recap of finances that is presented

15 to the owner so he could make financial decisions.

16 Q. And when was this Cash Report prepared?

17 A. Daily.

18 Q. And what's the date of this particular Cash

19 Report, Exhibit 2?

20 A. This appears to be April the 11th.

21 Q. Of this year?

22 A. Of 2016.

23 Q. And the time is 8:45 a.m.?

24 A. Yes.

25 Q. If you ran this report later in the day, would

15

1 there -- could it change?

2 A. Yes.

3 Q. Or would it change?

4 A. Yes, perhaps it would.

5 Q. Was it common that you would have a large

6 number of -- and I'm not an accountant, so if I misstate

7 the type of word, please forgive me, that there would be

8 more money that would typically come in on a Monday than

9 other days of the week?

10 A. Yes.

11 Q. Would it be a substantially -- would it be

12 fair to say that fairly consistently there would -- if
13 you ran this report at 5:00 in the afternoon on a
14 Monday, there would be more assets in the company than
15 if you ran it at 9:00 in the morning?

16 A. Deposits would be brought in during the day
17 and it would be added to the report.

18 Q. Okay. So typically, it would be larger at the
19 end of the day as opposed --

20 A. Not necessarily, not if checks had cleared
21 above that amount. Checks clear and deposits go in, so
22 it's fluctuating constantly.

23 Q. All right. How often would you run this Cash
24 Report?

25 A. I'd keep it calculated three times a day.

16

1 Q. And were these Cash Reports saved or would
2 they be accessible in a retrospective examination?

3 A. Yes, I have them saved.

4 Q. So if I ask you to give me a Cash Report from
5 other times on April 11th, you could do that?

6 A. Oh, I'm sorry. I cannot do that. I do not
7 have during the day. I only have the last one of the
8 day saved.

9 Q. Do you know who saved this one?

10 A. Saved it?

11 Q. Well, let me ask you, somebody punched in this
12 at 8:45 in the morning. Do you recollect doing that?

13 A. This would have been something that I would
14 do. Do I actually remember doing this on this date?
15 No.

16 Q. Would you email these reports to Mr. Hansen on
17 a regular basis?

18 A. At a point in time, I started emailing these
19 to him every night, at the end of the day.

20 Q. So how much money were in the corporation's
21 accounts at 8:45 on April 11th, 2016?

22 MR. GEARIN: Object to foundation. There is
23 no --

24 MR. FRUSH: Let me rephrase the question.

25 Q. (BY MR. FRUSH:) What does the report reflect

17

1 as -- I'm trying to figure out how to read this. What
2 does the report reflect as to how much money -- does the
3 report reflect how much money is in the bank that
4 belongs to the corporation?

5 MR. GEARIN: Again; object as to foundation.

6 Q. (BY MR. FRUSH:) Go ahead and answer it, if
7 you can. He's going to put objections in the record.
8 The way this works is he makes his objection, I can
9 decide to rephrase the question or not. It's something

10 you shouldn't worry about. If you can answer the
11 question, you should go ahead and answer the question.

12 All right?

13 A. Could you repeat it?

14 Q. Sure.

15 MR. FRUSH: Would you read it back for us,
16 please, Cheryl?

17 THE COURT REPORTER: "Question: I'm trying to
18 figure out how to read this. What does the report
19 reflect as to how much money -- does the report reflect
20 how much money is in the bank that belongs to the
21 corporation?"

22 A. I don't understand the question, "belongs to
23 the corporation."

24 Q. (BY MR. FRUSH:) Well, let's say how much
25 money is in the bank accounts that are the corporation's

18

1 bank accounts. Does the --

2 A. These are the corporation's -- the LLC, the
3 Mint's, this is the Mint's bank accounts, yes, it is.

4 Q. All right. So at that time, the Mint had
5 three accounts?

6 A. Yes.

7 Q. And how much money was in the bank, at
8 HomeStreet Bank at that time?

9 MR. GEARIN: Object as to foundation. She's
10 already said she doesn't have any personal knowledge.
11 She can talk about the report. I think your prior
12 questions have been what does the report reflect.

13 MR. FRUSH: That's fair enough.

14 Q. (BY MR. FRUSH:) What does the report reflect
15 as to how much money is in HomeStreet Bank?

16 A. It reflects that -- it reflects the amount
17 that's in there right now, it reflects what the account
18 would be at if all the checks had been written that were
19 in the mail, what the account would be.

20 Q. Now, where is that reflected?

21 A. Directly under the name "HomeStreet Bank" it
22 says "True Balance." Those are checks that had been
23 written. And if all of them had cleared, that would be
24 the bank status.

25 Q. What's the "On Hold" mean?

19

1 A. That means those are checks that had been
2 written that had not been approved to be sent out yet.

3 Q. As I understand it, the report reflects that
4 there was \$67,000 in the bank, but there was \$113,000 in
5 checks outstanding on that bank account; is that right?

6 A. Yes.

7 Q. And then on the Bank of America, the report

8 reflects \$151,000 in the bank?

9 A. Yes.

10 Q. Now, that's a positive number underneath. The

11 \$113,000, what does that reflect?

12 A. That reflects a \$37,000 check out in the mail.

13 And if it cleared, the account would be at \$113,000.

14 Q. Okay. And then the KeyBank has nothing that's

15 out in the mail?

16 A. That is correct.

17 Q. So the report reflects how much as far as the

18 net amount of monies are in the corporation's bank

19 accounts?

20 A. Available.

21 Q. Right. And that number is \$218,000?

22 A. That's what this report suggests.

23 Q. Is there something else that would somehow

24 make this report inaccurate? I mean, you say it

25 suggests --

20

1 A. It changes during the day.

2 Q. But at that point in time, at 8:45 in the

3 morning, there is a net \$218,000 in the corporation's

4 bank accounts. Is that fair to say?

5 MR. GEARIN: Object.

6 Q. (BY MR. FRUSH:) Reflected in the report.

7 A. That is what this report reflects, yes.

8 MR. FRUSH: Okay. I'm going to ask that this
9 be marked as Exhibit 3.

10 (Deposition Exhibit 3 was marked for
11 identification.)

12 Q. (BY MR. FRUSH:) Again, there is a No. 9 on
13 it. There you go, Annette. Take a look at that, if you
14 would, please.

15 This would be Exhibit 3 for you. Is this a
16 Cash Report for April 18th?

17 A. The piece of paper says that this is a Cash
18 Report from 4/18, "AM." Unless I check my records, I
19 cannot vouch that yes, this is. It appears to be.

20 Q. Take a look through it. It's about 10,
21 15-pages long.

22 A. No. This is not my -- the report.

23 Q. It is not your report?

24 A. This is not the Cash Report for 4/18, all of
25 these papers.

21

1 Q. So what are the other papers? I'm trying to
2 understand this. The Cash Report is reflected on the
3 first page; is that correct?

4 A. This is a recap of -- yes, this is a recap.

5 Q. And so as of the morning, or rather it just

6 says "AM" here, in the morning of 4/18 was there
7 \$511,000? Does this report reflect that there is an
8 available \$511,000 in the corporation's accounts?

9 A. Yes, it does.

10 Q. Is there something in the balance of these
11 documents in the report, the pages in the report that
12 help us better understand the financial situation of the
13 company as far as how much money is reflected as being
14 in the accounts of the corporation?

15 A. I apologize. I don't understand your
16 question.

17 Q. Why don't we just go through it. What's the
18 second page reflect?

19 A. So this is the Bank of America spreadsheet.

20 Q. On page two?

21 A. And this would be for April the 18th. And so
22 this is the Bank of America backup information.

23 Q. And then the third page?

24 A. So this is --

25 Q. It's the KeyBank?

22

1 A. This is KeyBank.

2 Q. All right.

3 A. Yeah. And then this one is HomeStreet Bank.

4 Q. That's the --

5 A. This is HomeStreet, right.

6 Q. Well, you're going to have to give me a page
7 number so we have a clear record.

8 A. Do you count this as one?

9 Q. I take the top page as one.

10 A. It's page five.

11 Q. What's on page four?

12 A. Page four is the second page of KeyBank.

13 Q. Oh, I see. And then you get over to --

14 A. There is HomeStreet Bank, one, two, three,
15 four pages of HomeStreet Bank. That is the Cash Report.

16 Q. And so you've got all three accounts?

17 A. Yes.

18 Q. What do the balance of these pages reflect?

19 A. I am not -- I do not know why they're here.

20 Q. Would they normally --

21 A. These are not part of this report.

22 Q. Generally?

23 A. Generally.

24 Q. When you were preparing it, it would not be
25 part of the report?

1 A. Correct.

2 Q. Okay. I'm just trying to understand.

3 A. Yes, yes.

4 Q. It's not a test. Okay?

5 A. Yes.

6 Q. All right. Thank you.

7 Do you know Stacy Butler?

8 A. Yes.

9 Q. And do you know Patty --

10 A. I'm sorry. Go ahead.

11 Q. Do you know Patty Hoffman?

12 A. Yes.

13 Q. Who is Stacy Butler?

14 A. She was a receptionist at the company.

15 Q. Did she leave the company at some point?

16 A. Yes, she did.

17 Q. Why did she leave the company?

18 A. She left the company because she was caught

19 stealing.

20 Q. And was she prosecuted?

21 A. I don't really know what happened to the

22 outcome. I thought it was still pending.

23 Q. And do you know Patty Hoffman?

24 A. Yes.

25 Q. What was Patty Hoffman's position with the

1 company?

2 A. Receptionist as well.

3 Q. Did she work closely with Stacy Butler?

4 A. Yes.

5 Q. And is it fair to say that they were close
6 friends?

7 A. I have no knowledge.

8 Q. Now, the receptionists sit in an area that has
9 surveillance cameras; is that correct?

10 A. Yes.

11 Q. And it has multiple surveillance cameras,
12 doesn't it?

13 A. I'm -- I do not know the answer to that
14 question.

15 Q. Would it surprise you if there were as many as
16 three surveillance cameras in the reception area?

17 A. It would surprise me if they were looking at
18 all of the same place.

19 Q. Right.

20 A. That would surprise me, yes.

21 Q. No, no, I just meant there were three
22 different cameras mounted -- surveillance cameras that
23 surveilled the different aspects of the reception area.

24 A. I'm sorry. I did not ever notice there was
25 three.

1 Q. All right. Now, there was an EEOC complaint

2 filed against the company, wasn't there?

3 A. Yes.

4 Q. And it was filed by Patty Hoffman, wasn't it?

5 A. Hearsay, yes.

6 MR. GEARIN: Well, so if you don't know the
7 answer, don't answer.

8 A. I do not know who filed it.

9 Q. (BY MR. FRUSH:) Is it your understanding that
10 Patty Hoffman filed it?

11 A. I do not know who filed it.

12 Q. What is your understanding?

13 A. I don't -- nobody has ever said that she filed
14 it, so I do not know.

15 Q. Do you know that she's -- is it your
16 understanding that she's the person that complained that
17 Mr. Hansen acted inappropriately towards her?

18 A. Yes.

19 Q. And that included allegedly groping her in the
20 reception area?

21 A. I wasn't aware of the details.

22 Q. And you're not aware that these actions
23 allegedly occurred in an area that was surveilled?

24 A. I am aware that -- what is your question?

25 Please repeat.

1 Q. Never mind.

2 Was Patty Hoffman upset that Stacy Butler was
3 terminated?

4 A. I was not aware of that.

5 Q. Patty Hoffman quit very shortly after that
6 period of time that Stacy was terminated, didn't she?

7 A. I don't recollect the time frame. It was
8 after she had left, but I don't recollect the time
9 frame.

10 Q. Do you know whether Patty Hoffman made any
11 statements that reflected she was going to get even or
12 some kind of retribution, or words to that effect, for
13 the firing and prosecution -- firing of Stacy Butler?

14 A. I did not hear anything like that.

15 Q. Okay. I'm going to show you what's become our
16 favorite exhibit.

17 (Deposition Exhibit 4 was marked for
18 identification.)

19 Q. (BY MR. FRUSH:) I'll show you what's been
20 marked as Exhibit 4. And again, these other markings on
21 it are simply a reflection that this has been used at
22 other depositions.

23 A. I understand.

24 Q. Have you seen this document before?

25 A. Yes, I have.

1 Q. And this is a document that forbids you and
2 other Mint employees from speaking to Ross and Diane
3 Erdmann or the press; isn't that right?

4 A. That's correct.

5 Q. And it indicates that if you do that, you may
6 be terminated; is that correct?

7 A. I would have to read the entire thing over
8 again to answer your question.

9 Q. You go right ahead and do that.

10 A. Okay.

11 Q. Do you remember getting this memo?

12 A. I remember reading it, yes.

13 Q. And was that around the time that it's dated,
14 April 16th, 2016?

15 A. I believe so, yes.

16 Q. And did you take this memorandum seriously?

17 A. Yes.

18 Q. You note in your declaration that between
19 April 26 and May 18th, Diane Erdmann tried to contact
20 you by text and voicemail and that you did not return
21 her call or text. Do you see that in paragraph three
22 of --

23 A. Yes, I'm familiar with it.

24 Q. Did this memorandum influence your decision
25 not to return her calls or texts?

1 A. In part.

2 Q. They appeared at the Federal Way facility you
3 indicate unannounced on May 18th; is that correct?

4 A. That's correct.

5 Q. Are you aware whether Mr. Hansen had spoken
6 the day before with Paul Ward about --

7 MR. HANSEN: Patrick.

8 Q. (BY MR. FRUSH:) I'm sorry, Patrick Ward about
9 coming by to pick up some documents?

10 A. I'm sorry. What is the question?

11 Q. Sure. Are you aware whether Ross had spoken
12 with Patrick Ward, Security personnel, at the Mint on
13 the day before, May 17th, about his intention to come by
14 and pick up documents?

15 A. I did not know that it had happened until
16 Mr. Hansen told me that he had, or he was telling Dave
17 Huffman.

18 MR. GEARIN: Object; foundation as to whether
19 she has any basis for knowing any conversation that
20 Mr. Hansen had with somebody else.

21 MR. FRUSH: You can just object. If I have
22 trouble figuring out the nature of the form of your
23 objection, I'll rephrase. And if I don't, I'll ask you.
24 I just don't like you suggesting to the witness
25 anything. That's kind of the way I practice. I think

1 that's a fair way.

2 MR. GEARIN: Well, I think the way I practice
3 is I want you to be clear about what the nature of the
4 objection is.

5 MR. FRUSH: Well, the problem with that, Mike,
6 is it suggests to the witness that, jeez, I object,
7 calls for speculation. And then the witness says, oh, I
8 don't want to speculate. And when you make a speech
9 about, well, I don't want you to talk about it unless
10 it's something Mr. Hansen said to you, I'll try and make
11 sure we get it clear. She didn't really have an answer
12 to that question.

13 MR. GEARIN: I think my role, Jim, is to
14 object when appropriate, and your role is to ask the
15 questions.

16 MR. FRUSH: All right. We'll see where we go.

17 MR. GEARIN: Sure.

18 Q. (BY MR. FRUSH:) Did there come a time when
19 you learned that Mr. Hansen had contacted Patrick Ward
20 the day before about coming by to pick up the documents?

21 A. I believe I did hear that.

22 Q. Who did you hear it from?

23 A. Mr. Hansen, I believe.

24 Q. At what time did you hear it from Mr. Hansen?

25 A. When he was standing in my office.

30

1 Q. So he indicated to you that he had
2 contacted -- this is on May 18th, he indicated he had
3 contacted Mr. Ward; is that right?

4 A. I believe that he was speaking to Mr. Huffman
5 when he said that. I was not part of the conversation,
6 only overheard it.

7 Q. So you overheard him tell that to Mr. Huffman?

8 A. To the best of my recollection, I do believe
9 that is what happened.

10 Q. Was Maura Richardson there that day, on the
11 18th?

12 A. I don't recall.

13 Q. Was that about the time that she quit working
14 for the company, at least temporarily?

15 A. I don't remember what dates she went. She
16 went on vacation and didn't come back. I don't know
17 what date that was. She was gone for two weeks.

18 Q. Was that a preplanned vacation or was that in
19 response to events that were occurring, or do you know?

20 A. I do not know, honestly.

21 Q. Do you have an opinion as to why she left?

22 A. I don't know why she left. But in regards to
23 her vacation request, is what the question was, did I

24 know about it ahead of time, I believe I did know a
25 couple days ahead of time, maybe even a week.

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1 So it could have been preapproved and
2 preplanned. I'm not aware.

3 Q. Now, the documents we're talking about, the
4 documents -- is it your understanding that the documents
5 were copies of documents that related to Medallic Art?

6 MR. GEARIN: Object; vague. What documents?

7 Q. (BY MR. FRUSH:) The documents that Mr. Hansen
8 was supposed to pick up --

9 A. Yes.

10 Q. -- or that he said he was supposed to pick up.

11 A. Right.

12 Q. What was your understanding as to what
13 comprised those documents? What was in those documents?
14 What were they documents about?

15 A. I assumed he was looking for the agreement
16 between Mr. Bressler and himself.

17 Q. You prepared financial statements for Medallic
18 Art, didn't you?

19 A. I replicated the CFO's reports that he pulled
20 out of the system that were already pre-prompted with
21 specific numbers.

22 Q. And those reports accounted for the finances

23 of Medallic separate from the Mint. Is that accurate to
24 say?
25 MR. GEARIN: Object as to foundation. She

32

1 just testified all she did was replicate the reports.

2 Q. (BY MR. FRUSH:) If you understand my
3 question, you can go ahead and answer.

4 A. Could you repeat the question?

5 THE COURT REPORTER: "Question: And those
6 reports accounted for the finances of Medallic separate
7 from the Mint. Is that accurate to say?"

8 A. That is accurate.

9 Q. (BY MR. FRUSH:) And did you provide those
10 financial statements to Mr. Bressler on occasion?

11 A. After Mr. Furuness left the company.

12 Q. You did provide those reports to Dick
13 Bressler?

14 A. Yes, I did.

15 Q. Okay. Was it your understanding that the
16 documents that Mr. Hansen was there to collect were
17 documents that related -- that were copies of documents
18 that related to Medallic Art?

19 A. What is the question?

20 Q. I'll rephrase it. I'm trying to be careful so
21 Mr. Gearin won't jump on me.

22 MR. GEARIN: The poor defenseless guy that you
23 are.

24 MR. FRUSH: That's true.

25 Q. (BY MR. FRUSH:) Was it your understanding

33

1 that these documents that Ross was coming by to collect
2 were copies of documents that related to Medallic Art?

3 A. No, I don't recall thinking about that either
4 way.

5 Q. Did you have some documents that you were
6 aware Mr. Hansen wanted to pick up?

7 A. No. I did not know he was wanting to come in
8 and pick them up. I wasn't aware of it before he showed
9 up.

10 Q. Had Maura given you some documents that were
11 the subject of that visit prior to Mr. Hansen arriving
12 there?

13 A. The documents that he was requesting were
14 always held in the accounting department.

15 Q. Had anybody made any effort to segregate those
16 documents, prior to him arriving there?

17 A. No.

18 Q. Did Maura tell you to compile certain
19 documents relating to Medallic Art?

20 A. No.

21 Q. Did anybody direct you to compile certain
22 documents relating to Medallic Art?

23 A. Who do you mean?

24 Q. I'm just asking anyone.

25 A. Anyone?

34

1 Q. Yes.

2 A. At the time of the Tracy submitting the
3 bankruptcy, yes, I had to submit certain -- I had to
4 find the documents.

5 Q. Let me come at it this way, Annette. Ross
6 shows up and wants some copies of documents.

7 A. Okay.

8 Q. Does he tell you they're related to Medallic
9 Art?

10 A. He did say they were Medallic Art, yes.

11 Q. Did it appear to you that he expected you to
12 have a stack of documents ready for him? I don't know.
13 I'm just asking what you believed.

14 A. No, no.

15 Q. So did this catch you by surprise?

16 A. Yes.

17 Q. All right. Let's get to that. Ross and Diane
18 show up on May 18th; is that right?

19 A. Yes.

20 Q. Do you recall what time of day it was?
21 A. No, I do not.
22 Q. All right. And they came through the
23 reception area, I take it; is that correct?
24 A. I was in my office. I don't know how they
25 came in.

35

1 Q. And your office is near reception?
2 A. It's around the corner.
3 Q. Did you hear them come in?
4 A. I did not.
5 Q. When do you first see them?
6 A. I was coming out of the office and he was
7 coming around the corner.
8 Q. Was Diane with him?
9 A. I didn't see her at first. She was still back
10 in the second part of the hall coming down.
11 Q. Did she join you at some point?
12 A. I believe she stayed out of the office. I
13 don't recall her being inside my office with Ross.
14 Q. Do you recall giving her a hug?
15 A. Yes. She was outside the office.
16 Q. And you -- did you go out to the -- to her and
17 hug --
18 A. I was already outside the office.

19 Q. And you gave her a hug when you saw her?
20 A. I actually leaned in and told her I was taking
21 care of her plants.
22 Q. Good. Did you give her a hug?
23 A. Yes.
24 Q. All right. And how did you greet Mr. Hansen?
25 A. With a handshake.

36

1 Q. Were you frightened?
2 A. I was startled.
3 Q. But that's by the sudden interaction, or were
4 you frightened of Mr. Hansen?
5 A. From the abrupt interaction and from the court
6 order of him not being in the building, it startled me.
7 Q. When you say "court order," did somebody
8 represent to you that exhibit -- what's this exhibit
9 number on the suppression, the yellow tag?
10 MR. GEARIN: Four.
11 Q. (BY MR. FRUSH:) Exhibit 4, was that your
12 impression, that this was a court order?
13 A. I was under the impression that there was some
14 sort of document that was stated that he was not allowed
15 to come into the business, into the company building,
16 yes.
17 Q. Who gave you that understanding?

18 A. Oh, I'm sorry. I couldn't even tell you who

19 told me. I was --

20 MR. HANSEN: One moment. I apologize.

21 MR. GEARIN: Do you want to take a break?

22 MR. FRUSH: Let's take a break. We're on the

23 home stretch, Annette.

24 MR. HANSEN: My apologies for the

25 interruption.

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1 (Recess.)

2 MR. FRUSH: Where were we?

3 THE COURT REPORTER: "Question: Exhibit 4,

4 was that your impression, that this was a court order?

5 "Answer: I was under the impression that

6 there was some sort of document that was stated that he

7 was not allowed to come into the business, into the

8 company building, yes.

9 "Question: Who gave you that understanding?

10 "Answer: Oh, I'm sorry. I couldn't even tell

11 you who told me."

12 Q. (BY MR. FRUSH:) But was it your understanding

13 that Mr. Hansen was barred from the premises?

14 A. It was my understanding that he was to stay

15 away and not come into the office.

16 Q. And you don't recollect how you got that

17 understanding?

18 A. I don't.

19 Q. So did it surprise you to see him there?

20 A. Yes.

21 Q. Did you feel intimidated by Mr. Hansen?

22 A. I felt he took an intimidating posture over my
23 desk.

24 Q. How so?

25 A. In leaning into my space and trying to talk to

38

1 me very quietly.

2 Q. He was speaking to you in a soft voice?

3 A. Yes.

4 Q. And he was on the opposite side of the desk
5 from you; is that right?

6 A. Yes.

7 Q. He didn't come around the other side of the
8 desk right next to you, did he?

9 A. No, he did not.

10 Q. Did he make any threats against you?

11 A. No, he did not.

12 Q. He was asking for the Medallic Art documents;
13 is that right?

14 A. Yes, he did.

15 Q. And he was asking for copies; is that correct?

16 A. He asked for the files.
17 Q. And what did you tell him?
18 A. I told him that I could not give him any
19 document unless instructed by Mark Calvert.
20 Q. And what did he say?
21 A. He said that he made prior arrangements to
22 come and pick them up. I told him I was not aware of
23 it, and I called Mark Calvert.
24 Q. And did you get Mark?
25 A. I did not.

39

1 Q. At some point, Mr. Huffman comes on the scene;
2 is that correct?
3 A. That's correct.
4 Q. And he's on the other side of your desk
5 leaning over and asking you in a soft voice for the
6 documents. And you say, "I can't give them," whatever
7 you testified to. At what point in the process does
8 Mr. Huffman appear?
9 A. While Mr. Hansen is leaning over the desk
10 talking to me.
11 Q. So how long all together do you think
12 Mr. Hansen was in your office before he left with
13 Mr. Huffman?
14 A. Maybe ten minutes.

15 Q. That long?

16 A. I don't recall.

17 Q. It wasn't a very long period of time?

18 A. It could be shorter, it could be longer.

19 Approximately.

20 Q. And did you have other conversation with

21 Mr. Hansen other than about the documents?

22 A. Yes.

23 Q. What was the nature of that conversation?

24 A. He asked me where my loyalties lie.

25 Q. And what did you say?

40

1 A. I told him that I did not have loyalty to Ross

2 Hansen and I did not have loyalty to Mark Calvert, and

3 that as soon as the company became stable or sold, or

4 whatever was going to happen, I was going to go on to

5 disability, because I've been having some problems with

6 my back.

7 Q. Did that upset Mr. Hansen?

8 A. I do not have any knowledge of that.

9 Q. He didn't appear upset when you told him that?

10 A. No.

11 Q. And he didn't do anything in a negative

12 reaction to your statement that you were -- that you

13 just recited to me?

14 A. I believe that he was insinuating that I would
15 be without a job. Other than that --

16 Q. But that was an insinuation. I'm asking for
17 some concrete reaction.

18 A. I do not recall.

19 Q. All right. And what other conversation did
20 you have with Mr. Hansen?

21 A. I do not recall that we spoke of anything
22 else.

23 Q. All right. And when you told him that you
24 weren't giving him -- it's true that you told him you
25 weren't giving him documents without Mr. Calvert's

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1 permission, and you attempted to reach Mr. Calvert on
2 the phone?

3 A. That is true, yes.

4 Q. And what happens when you try to reach
5 Mr. Calvert?

6 A. I did not reach him. So I called one of his
7 employees.

8 Q. So while you're on the phone, what's
9 Mr. Hansen doing?

10 A. I would not know. I was -- I don't recall.

11 Q. I mean, was he standing?

12 A. Yes, in front of my desk where he was, yes.

13 Q. Did he have his hands on the desk the entire

14 time?

15 A. I believe that he did not have his hands on my

16 desk at that time.

17 Q. So he stood back from your desk while you were

18 making phone calls?

19 A. Yes.

20 Q. And he was waiting patiently?

21 A. Yes.

22 Q. And then what happens was you tried to get

23 somebody besides Mr. Calvert?

24 A. Correct.

25 Q. Was that Mr. Wagner?

42

1 A. No. Jody Cannady.

2 Q. Who is that?

3 A. She's one of his employees, Mark Hansen --

4 Mark Calvert's.

5 Q. Did you have any better luck?

6 A. Yes, I did get in touch with her.

7 Q. And what did she say?

8 A. She told me not to give him any files.

9 Q. And did you communicate that to Mr. Hansen?

10 A. Yes, I did.

11 Q. What was his reaction?

12 A. I believe that's when Mr. Huffman came in and
13 took over the conversation. Mr. Huffman said that we
14 would not be able to give him the files.

15 Q. Did Mr. Hansen provide you any paperwork
16 relating to his authorization to pick up the files?

17 A. I believe there was a piece of paper. I don't
18 recall what it said anymore. But yes, he did hand me a
19 piece of paper. I don't recall what it was.

20 Q. Did he also give the paper to Mr. Huffman?

21 A. I don't recall.

22 Q. Did you hear the entire conversation between
23 Mr. Huffman and Mr. Hansen?

24 A. I believe so.

25 Q. Now, you didn't follow them out to the front

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1 door?

2 A. No, I did not, just in my office.

3 Q. All right. And you overheard Mr. Hansen
4 telling Mr. Huffman that he had talked to Patrick Ward
5 the day before?

6 A. That's when I heard that, yes.

7 Q. What else did you hear between Mr. Hansen and
8 Mr. Huffman?

9 A. Mr. Huffman asking Mr. Hansen to leave.

10 Q. Did Mr. Huffman tell Mr. Hansen he'd call the

11 police?

12 A. Yes, he did.

13 Q. And did he tell Mr. Hansen that he had three

14 minutes to leave?

15 A. I believe he did.

16 Q. And what was Mr. Hansen's reaction?

17 A. He says, "I don't want to have any trouble.

18 I'll leave."

19 Q. And did he do just that?

20 A. Yes, I believe he did.

21 Q. Were you aware at the time that Mr. Hansen

22 came in to get the documents whether there was an FBI

23 investigation of either the Mint or Mr. Hansen?

24 A. I was not given the knowledge that there was

25 an FBI investigation going on.

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1 Q. Did you --

2 A. I'm sorry. Could you repeat the question?

3 Q. Sure, sure, you bet. And let's go back to

4 when Mr. Hansen came into the office.

5 A. Okay, okay.

6 Q. At that time, he had been gone for about --

7 well, let me back up. I will strike all that and start

8 over.

9 Mr. Hansen left the company at about

10 April 12th. Does that sound about right?

11 A. I think that I have been told the 11th.

12 Q. All right. Close enough.

13 A. Yes.

14 Q. At the time he came in to get the documents
15 some five or six weeks later, were you aware that there
16 was an investigation, FBI investigation of the company
17 or Mr. Hansen?

18 A. I don't know how to answer the question.
19 There were FBI people there occasionally asking
20 questions, but as far as them telling me that there is
21 an investigation, no. And I did not know that there was
22 one on -- for him personally, no.

23 Q. And so you have two or three accounting staff
24 working for you; is that right?

25 A. Yes.

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1 Q. And I take it that any potential FBI
2 investigation of Mr. Hansen was not something that had
3 been discussed with you and your staff or among your
4 staff during that approximate month between when he left
5 and he came to pick up the documents. Is that accurate?

6 A. I would not have any knowledge if somebody
7 went to talk to one of my employees. It wasn't brought
8 to my attention. Yeah, it wasn't brought to my

9 attention.

10 Q. I guess I'm not being very artful. You didn't
11 have any conversation with your staff about an FBI
12 investigation of Mr. Hansen?

13 A. No, I did not.

14 Q. And you didn't really learn there was an
15 investigation of Mr. Hansen until you were deposed back
16 in June, did you?

17 A. I didn't even know then.

18 MR. FRUSH: Well, let's mark this.

19 (Deposition Exhibit 5 was marked for
20 identification.)

21 Q. (BY MR. FRUSH:) I'm going to show you what's
22 been marked as Exhibit 5. It's a transcript of your
23 testimony from the June 8th deposition. And again --

24 A. The deposition?

25 Q. Yes, the deposition.

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1 A. All right.

2 Q. And again, this is not a test and we're not
3 trying to trick you, I'm just trying to refresh your
4 recollection.

5 A. Yes.

6 Q. Why don't you just take a minute and read
7 through it, and then we'll talk about -- and actually, I

8 think I copied more pages than I needed. You might want
9 to start on page 41.

10 A. Where it's highlighted?

11 Q. Did you get -- oh, see, that's my copy.

12 That's not fair. I can't take advantage of you if you
13 know where the highlighting is.

14 I'll get this right eventually. There you go.

15 A. All right.

16 Q. I forgot where I was supposed to start; I
17 couldn't find my highlighting.

18 All right. Start about mid 41 and go through
19 42. I'm particularly interested in page 42, lines
20 eleven through 24.

21 A. Okay.

22 Q. So you testified back in June, if I'm reading
23 your transcript correctly, that at least before that
24 day, June 8th, 2016, you were unaware of any criminal
25 investigations; is that right?

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1 A. Of Ross Hansen or Diane Erdmann.

2 Q. Right. And you felt the investigation was
3 being conducted by Mr. Calvert's team; is that right?

4 A. That's what I said here, yes, that the
5 criminal investigation -- the company was being
6 investigated, yes.

7 Q. By Mr. Calvert's team?

8 A. Yes, yes.

9 Q. And that you indicated you weren't aware of an
10 investigation by anyone else?

11 A. Yes, I see that I said that.

12 Q. And was this accurate when you said it?

13 A. It's hard to remember when things were said.
14 So to the best of my knowledge, at this time I was
15 speaking the truth. At this time, I'm speaking the
16 truth. I don't remember time frames. I'm sorry.

17 Q. It's fair to say that June 8th, almost seven
18 weeks ago --

19 A. June 8th, okay.

20 Q. -- these events were more recent to you, more
21 recent occurrence to you at that point. Is that fair to
22 say?

23 A. Than --

24 Q. Than they are today.

25 A. Oh, they're further away now than they were,

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1 yes.

2 Q. And you were closer in time --

3 A. Then, yes, okay.

4 Q. It's more likely you'd have a better memory
5 two months ago than today. Is that fair to say?

6 A. Yes, I see where you're going with that.

7 Q. Would you agree with me?

8 A. I would agree.

9 MR. FRUSH: Why don't we take a quick
10 two-minute break. I may have one more question but not
11 much. We're almost through.

12 MR. GEARIN: Sounds good.

13 (Recess.)

14 MR. FRUSH: I have no further questions,
15 Annette.

16 (Deposition recessed at 2:30 p.m.)

17 (Signature was requested.)

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1 CORRECTION & SIGNATURE PAGE

2 RE: NORTHWEST TERRITORIAL MINT, LLC

3 UNITED STATES BANKRUPTCY COURT; No. 16-11767-CMA

4 ANNETTE TRUNKETT; TAKEN JULY 29, 2016

5 Reported by: CHERYL O. SPRY, CCR No. 2226

6 I, ANNETTE TRUNKETT, have read the within
7 transcript taken JULY 29, 2016, and the same is true and
8 accurate except for any changes and/or corrections, if
9 any, as follows:

10	PAGE/LINE	CORRECTION	REASON
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11	_____		
12	_____		
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17	_____		
18	_____		
19	_____		
20	_____		
21	_____		

22 Signed at _____, Washington,
23 on this date: _____

24

25 _____
ANNETTE TRUNKETT

1 REPORTER'S CERTIFICATE

2 I, CHERYL O. SPRY, the undersigned Certified Court
3 Reporter, pursuant to RCW 5.28.010, authorized to

4 administer oaths and affirmations in and for the State
5 of Washington, do hereby certify:

6 That the sworn testimony and/or proceedings, a
7 transcript of which is attached, was given before me at
8 the time and place stated therein; that any and/or all
9 witness(es) were by me duly sworn to testify to the
10 truth; that the sworn testimony and/or proceedings were
11 by me stenographically recorded and transcribed under my
12 supervision, to the best of my ability; that the
13 foregoing transcript contains a full, true, and accurate
14 record of all the sworn testimony and/or proceedings
15 given and occurring at the time and place stated in the
16 transcript; that a review of which was requested; that I
17 am in no way related to any party to the matter, nor to
18 any counsel, nor do I have any financial interest in the
19 event of the cause.

20 WITNESS MY HAND AND DIGITAL SIGNATURE THIS 30TH day
21 of JULY, 2016.

22

23 _____

24 CHERYL O. SPRY
25 Washington State Certified Court Reporter No. 2226
cspry@yomreporting.com